

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA)
v.)
THOMAS C. GOLDSTEIN,)
Defendant)
CRIMINAL NO. LKG-25-6

MOTION FOR LEAVE TO EXCEED PAGE LIMITATION

The United States of America, by its undersigned attorneys, respectfully requests leave to file a consolidated opposition brief in excess of the normal page limit for a single opposition brief.

On April 1, 2025, Defendant filed a Motion to Invalidate Certain Orders Suspending the Statute of Limitations. ECF 112. On May 16, 2025, Defendant filed a Motion to Dismiss Counts 1, 5, 6, and 15 as Barred by the Statute of Limitations. ECF 121. On June 18, 2025, the Government responded to both of those motions in its Opposition to Defendant's Motion to Invalidate Certain Orders Suspending the Statute of Limitations and Motion to Dismiss Counts 1, 5, 6, and 15 as Barred by the Statute of Limitations ("the Opposition"). The Government submits that consolidating its responses in the Opposition will make it easier for the Court to keep track of the briefing and minimize the need to repeat certain arguments that are relevant to both motions.

The Government’s Opposition is 51 pages, which is 21 pages longer than the limit for a single opposition brief. *See* D. Md. L. R. 105(3). However, the Opposition is 9 pages shorter than the total number of pages (60) that would be permitted if the Government filed separate oppositions to Defendant’s motions. That context confirms that this Motion is not an attempt to

circumvent the page limit; it is a good faith effort to facilitate efficient evaluation and resolution of the issues.

WHEREFORE for the foregoing reasons, the Government requests that the Court grant the Government leave to file its leave to file its Opposition in excess of the normal page limit for oppositions.

Respectfully submitted,

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/s/

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